

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>In re: Lumber Liquidators Chinese- Manufactured Flooring Products Marketing, Sales Practices and Products Liability Litigation</b>	) ) ) )	<b>Case No. 1:15-md-02627-AJT/TRJ</b> This document relates to all cases.
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**THE WILLIAMS PLAINTIFFS' GROUP'S CORRECTED RESPONSE TO OTHER  
PARTIES' APPLICATION TO SERVE ON PLAINTIFF'S STEERING COMMITTEE**

COMES NOW the Williams Plaintiffs' Group<sup>1</sup> and submits this Response to the various applications to serve as Interim Lead Counsel and/or Plaintiffs' Steering Committee that have been submitted by attorneys representing plaintiffs in this litigation. The competing leadership structures that have been proposed seem to be the result of a different era. The "good ol' boy" network should not be used to exclude qualified, capable attorneys.

For instance, Cullin O'Brien is a very qualified attorney. He is a Harvard Law School graduate with extensive class action and consumer protection experience and a person of color. Carin Marcussen is a female attorney with extensive insurance litigation and significant class action experience. There is no cogent reason why these qualified attorneys should not be included in Plaintiffs' leadership structure. Both have expressed an interest to the multiple groups seeking to "control" this case, often with no response.

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<sup>1</sup> "The *Williams* Plaintiffs Group" refers to plaintiffs in the following actions, which have been transferred to this Court pursuant to the Judicial Panel on Multidistrict Litigation's June 12, 2015 Transfer Order: *Todd Williams v. Lumber Liquidators*, Case No. 1:15-cv-21432, filed 04/16/2015, USDC, S.D. Fla.; *John Williams v. Lumber Liquidators*, Case No. 2:15-cv-14142, filed 04/20/2015/2015, USDC, S.D. Fla.; *Jacqueline Crawford v. Lumber Liquidators*, Case No. 2:15-cv-60891, filed 04/27/2015, USDC, S.D. Fla.; and *Dianne McGreevy v. Lumber Liquidators*, Case No. 4:15-cv-01110, filed 04/28/2015, USDC, S.D. Tex.

Instead, the “good ol’ boy” network of intertwined law firms has sought to capture the case and exclude all but the usual cast of characters. The Williams Plaintiffs’ Group has vetted their clients and filed complaints for plaintiffs who can demonstrate elevated levels of formaldehyde. Many law firms have not. Ms. Marcussen’s law firm has offices in Oklahoma and Texas. There are no other firms seeking an active role from Oklahoma and only one other from Texas. Mr. O’Brien is based in south Florida and has experience in courts nationwide. Certainly, each of these attorneys warrant consideration to assist in the prosecution of this case. The class will benefit from the involvement of Mr. O’Brien and Ms. Marcussen through more efficiency and a broader base of input.

Respectfully submitted,

/s/ Wayne G. Travell

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Dated: August 4, 2015

*Counsel for the Williams Plaintiffs Group*

### CERTIFICATE OF SERVICE

I hereby certify that on this 4<sup>th</sup> day of August, 2015, a true and correct copy of the foregoing **The Williams Plaintiffs Group's Corrected Response to Other Parties Application to Serve on Plaintiff's Steering Committee** was filed electronically with the clerk of this Court using the CM/ECF system, and in accordance with Local Rules and the procedures adopted in the Initial Order and Pretrial Order No. 1A, and which will send a notice of electronic filing to all registered users.

/s/ Wayne G. Travell

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